



Honorable Harold Baer
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

RE: NGWA v. CASTLE POINT et al.
CV 08-00859

Dear Honorable Judge Baer:

I represent the interests of the plaintiff, Vera Ngwa, in the above-referenced matter. The subject action is brought by the plaintiff, by reason of defendants' alleged violation of Federal Truth In Lending law (as well as related state consumer law), in connection with a refinance money mortgage loan issued by defendant Castle Point Mortgage, Inc. (and thereafter assigned to GMAC Mortgage, LLC), secured by plaintiff's residential premises located in New York, New York.

Please allow this letter to serve as plaintiff's application, brought on behalf of all parties to this matter, for an adjournment of the Pre-Trial Counsel conference scheduled for March 20, 2008 (at 3:45 P.M.). I bring this application for multiple reasons. Firstly, it is my understanding that counsel for all defendants in this matter continue to await complete receipt of the "loan files" maintained by their respective clients. As such, all parties had stipulated for an extension of time for defendants' to answer plaintiff's Complaint (April 14, 2008 for defendant GMAC Mortgage, LLC; April 30, 2008 for defendants Castle Point Mortgage, Inc., Heather Gearin and Royal Settlement Services, Inc.). In the absence of necessary information concerning the subject loan transaction, it is difficult for the parties to engage in meaningful communication necessary for purposes of putting together a workable pre-trial scheduling order. Secondly, I was previously advised by Stan Goldberg, Esq. (the attorney assigned to represent defendant GMAC Mortgage, LLC in this matter) that he would be out of the country this week. As Mr. Goldberg had previously forwarded correspondence to the Honorable Court requesting an extension of defendant's time to answer plaintiff's Complaint, it was thought that such

a request would result in an adjournment of the Pre-Trial Conference. Mr. Goldberg and myself had even discussed the possibility of submitting dates for this purpose to the Honorable Court (with Mr. Goldberg also concerned about any dates which may conflict with the Passover Holiday), prior to our learning about the representation on this matter on behalf of the other defendants in this action (with counsel for co-defendants having just brought application for an extension of time to answer plaintiff's Complaint last week, by written correspondence dated March 11, 2008; and with a stipulation having been subsequently "so ordered" by the Court). As such, I believe that it would be feasible if Mr. Goldberg would have the opportunity to be present for this conference (as well as involvement with any resultant pre-trial scheduling order), given that he is the attorney representing defendant GMAC Mortgage, LLC, through whom all communication is to be made.

I have represented to counsel for all parties that I am submitting this letter to the Court. Keith Grace, Esq. (attorney for defendants Castle Point Mortgage, Inc., Heather Gearin and Royal Settlement Services, Inc.) has consented to the foregoing application. As referenced, Mr. Goldberg and I had discussed such an application previously.

I was instructed by "Natalie" to facsimile this request to Chambers.

Very truly yours

David M. Harrison (DH6)

cc: Platzer, Swergold, Karlin, Levine,
Goldberg & Jaslow, LLP
150 East 52nd Street
26th Floor
New York, New York 10022
Attn.: Linda Gates, Esq.
By: Facsimile: (212) 593-0353

Conway, Farrell, Curtin & Kelly, P.C.
48 Wall Street
20th Floor
New York, New York 10005
Attn.: Keith D. Grace, Esq.
By: Facsimile: (212) 993-9389

*I need adjourn the PTC
to April 3 at 12:30 PM by
which time I am hopeful several
lawyers will have been secured*

CO ORDERED.

Harold Baer, Jr., U.S.D.J.

Date: 3/19/08

Endorsement:

I will adjourn the PTC to April 3 at 12:30 PM by which time I am hopeful service and lawyers will all have been secured.